

**Matter 7**  
**Home Builders Federation (HBF)**

**CHARNWOOD LOCAL PLAN EXAMINATION**  
**MATTER 7 – HOUSING LAND SUPPLY**

**Inspector's issues and questions in bold type.**

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission Local Plan consultation dated 23 August 2021. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document issued on 25 April 2022.

**Issue 1 – Whether the Plan will provide for a sufficient housing land supply to deliver the planned housing growth over the Plan period and whether a deliverable five year supply of housing will be available on adoption**

**Supply over the Plan Period**

**Q7.1 What assumptions have been made to inform the trajectory for the delivery of housing sites in terms of:**

- a. Lead in times for planning permission being approved**
- b. Outline and reserved matters applications**
- c. Site preparation and ground works**
- d. Average build out rates and numbers of sales outlets**

The HBF's pre-submission representation points out that the Council's assumptions on lead in times and delivery rates should be realistic and supported by parties responsible for the delivery of housing on each individual site. In response to the Inspectors request for further evidence to confirm the 5 YHLS on adoption (EXAM 1), the Council has confirmed that an updated housing trajectory based on data collected from monitoring year 2021/22, individual site proformas and site-specific Statements of Common Ground will be available by 29<sup>th</sup> April 2022 (EXAM 1a & 2a). However, after making further enquiries, the HBF understand that this information will be submitted with the Council's Hearing Statement. If the HBF has any concerns about the housing delivery assumptions set out in this new evidence, these will be made orally during the Hearing Session.

**Q7.2 Will the Plan identify a sufficient supply of specific, deliverable sites for years 1 – 5 of the Plan period and specific, developable sites or broad locations for growth for years 6 – 10 and where possible for years 11 – 15?**

The HBF is concerned that the Local Plan has not identified a sufficient supply of housing sites. There is a "buffer" of only 1,685 dwellings (9.4%) between the Council's overall housing land supply (HLS) and its housing requirement. There is no mathematical formula for determining the appropriate amount of headroom but where HLS is overly dependent on a few Sustainable Urban

Extensions (SUEs) (43% of HLS in Charnwood) and / or localities (81% of HLS in Charnwood is located in the Urban Areas of Leicester, Loughborough & Shepshed) greater numerical flexibility is necessary than where HLS is more diversified. In Charnwood, the HBF would advocate a contingency larger than 9.4% to allow for non-delivery as well as to provide wider choice of sites for small, medium & large house building companies and to optimise flexibility in the overall HLS.

Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. On SUEs, there may be long lead in times before the commencement of on-site development and build up to optimum delivery rates. To ensure a continuous short to medium term HLS, SUEs should be complimented by smaller non-strategic sites. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides competition in the land market.

**What is the estimated total supply of deliverable and developable new housing from the following sources:**

- a. **Sites with detailed planning permission for 10 or more dwellings**
- b. **Sites with outline or detailed planning permission for 9 or less dwellings**
- c. **Windfall allowance**
- d. **Sites with outline planning permission for 10 or more dwellings**
- e. **Site allocations**
- f. **Sites on the brownfield register**

At Local Plan pre-submission consultation, the Council's overall HLS was 19,554 dwellings comprising of :-

- 8,355 dwellings from commitments on existing Sustainable Urban Extensions (SUE) at North East of Leicester in Thurmaston (Policy LUA2) for 3,205 dwellings, West of Loughborough (Policy LUC2) for 3,200 dwellings & North of Birstall (Policy LUA3) for 1,950 dwellings ;
- 2,248 dwellings from other existing planning permissions commitments as at 31st March 2021 ; and
- 8,858 dwellings from housing allocations under Policy DS3.

**Q7.3 What evidence is there to support the estimated supply from the above sources and is it robust?**

During the Local Plan pre-submission consultation, the HBF was concerned that the Council's supporting evidence was not robust (see HBF answer to Q7.1 above).

**Q7.4 How does the proposed annual requirement of 1111 dwellings in Policy DS1 compare with recent housing delivery?**

The proposed annual housing requirement of 1,111 dwellings per annum and recent housing delivery are almost identical. The 2021 Housing Delivery Test (HDT) Results show 1,117 completions in 2018/19, 993 completions in 2019/20 (after 1 month adjustment for Covid 19 lockdowns) and 1,116 dwellings in 2020/21 (after 4 month adjustment for Covid 19 lockdowns). This suggests that the proposed housing requirement of 1,111 dwellings per annum is “business as usual” rather than a significant boost to HLS.

### **Five Year Housing Land Supply**

#### **Q7.5 What is the relevant five year period on adoption and what is the requirement?**

It is assumed that the Local Plan will be adopted before April 2023, the relevant 5 year period on adoption is 2022/23 – 2027/28. If the Local Plan is adopted post April 2023, the relevant 5 year period on adoption would move forward by 1 year. The housing requirement for the 5 year period is 5,555 dwellings.

#### **Q7.6 Does past delivery and/or the HDT results have any implications for the appropriate buffer to be added to the five year land supply?**

HDT results and past delivery have no implications for the buffer to be added to the 5 YHLS. The Council has confirmed that para 74b of the 2021 NPPF will not be used, therefore the appropriate buffer is 5%.

#### **Q7.7 Is there clear evidence to support the delivery of sites in the relevant five year period on adoption?**

During the Local Plan pre-submission consultation, the supporting evidence available provided insufficiently detailed background information on individual sites to satisfy the 2021 NPPF Glossary definition of deliverable. Clearer evidence is needed (see HBF answer to Q7.1 above).

#### **Q7.8 Based on a requirement of 1111 dwellings per year, would the Plan help to ensure a five year supply of deliverable sites on adoption and over the Plan period?**

Appendix 2 of the pre-submission Local Plan showed a marginal 5 YHLS position of only 5.37 years in 2021 reducing to 4.88 years in 2029 (page 223). If the Council cannot demonstrate a 5 YHLS on adoption of the Local Plan and maintain a 5 YHLS throughout the plan period, the Local Plan should not be found sound. Until the updated housing trajectory, site proformas and site-specific SoCG are published in the Council’s Hearing Statement, HBF is unable to assess if a 5 YHLS of deliverable sites on adoption and over the plan period will be assured.